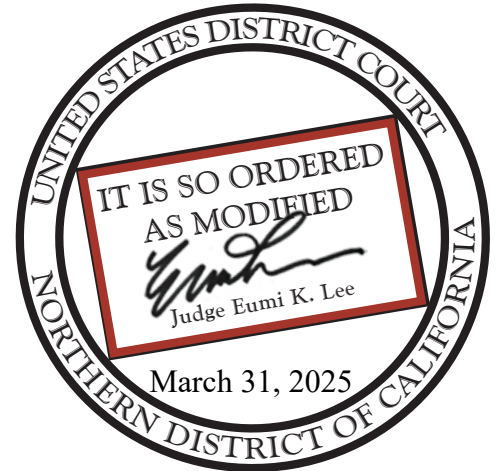


CRAIG J. MARIAM (SBN: 225280)
cmariam@grsm.com
JOSHUA D. BRADUS (SBN: 306568)
jbradus@grsm.com
NICHOLAS M. SIAMAS (SBN: 354118)
nsiamas@grsm.com
GORDON REES SCULLY MANSUKHANI, LLP
315 Pacific Avenue
San Francisco, CA 94111
Telephone: (415) 986-5900
Facsimile: (415) 986-8054

Attorneys for Defendant
POWERHOUSE RETAIL SERVICES, LLC



**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DAVID RAMIREZ, an individual, on behalf
of himself and all others similarly situated,

Plaintiff,

vs.

POWERHOUSE RETAIL SERVICES, LLC,

Defendant.

CASE NO. 5:24-cv-02170-EKL

*Assigned for all purposes to
Hon. Judge Eumi K Lee, Courtroom 8*

**JOINT STIPULATION TO EXTEND
DEADLINES BY 90 DAYS**

Complaint filed: April 11, 2024

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Northern District of California Local Rules 6-2 and 7-12, Plaintiff David Ramirez ("Ramirez") and Defendant Powerhouse Retail Services, LLC ("Powerhouse") (collectively, the "Parties") hereby stipulate to a 90-day continuance of the existing Discovery Cutoffs as set forth below.

Progress in this case has been affected by impacted schedules and a delayed discovery process. The Parties would like to explore early resolution possibilities and would like to minimize legal expenses and conserve judicial resources during this negotiations period. Therefore, the Parties have conferred and jointly consent to extending the following deadlines by ninety (90) days, with the court's assent. The Parties request the Court extend the deadlines as follows:

1 **Deadline to file class certification motion:** the Parties request this date be continued
2 from April 30, 2025 to July 29, 2025.

3 **Deadline to file opposition to class certification motion:** the Parties request this date be
4 continued from May 28, 2025 to August 26, 2025.

5 **Deadline to file reply in support of class certification:** the Parties request this date be
6 continued from June 27, 2025 to September 25, 2025.

7 **Class certification hearing:** the Parties request this date be continued from July 23, 2025
8 to October 22, 2025.

9 **Further case management conference:** the Parties request this date be continued from
10 September 17, 2025 to ~~December 16, 2025~~. **December 17, 2025 at 1:30pm by Zoom.**

11 **Close of fact discovery:** the Parties request this date be continued from October 31, 2025
12 to January 29, 2026.

13 **Deadline to complete initial ADR session:** the Parties request this date be continued
14 from October 31, 2025 to January 29, 2026.

15 **Initial Expert reports:** the Parties request this date be continued from November 21,
16 2025 to February 19, 2026.

17 **Rebuttal expert reports:** the Parties request this date be continued from January 15, 2026
18 to April 15, 2026.

19 **Close of expert discovery:** the Parties request this date be continued from February 27,
20 2026 to May 28, 2026.

21 **Deadline to file summary judgment motion(s):** the Parties request this date be
22 continued from March 31, 2026 to June 29, 2026.

23 **Deadline to file summary judgment opposition brief(s):** the Parties request this date be
24 continued from April 30, 2026 to July 29, 2026.

25 **Deadline to file summary judgment reply brief(s):** the Parties request this date be
26 continued from May 15, 2026 to August 13, 2026.

27 **Last day to hear summary judgment motion(s):** the Parties request this date be
28 continued from June 10, 2026 to ~~September 8, 2026~~. **September 16, 2026.**

GORDON REES SCULLY MANSUKHANI, LLP
315 PACIFIC AVENUE
SAN FRANCISCO, CA 94111

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Dated: March 28, 2025

GORDON REES SCULLY MANSUKHANI, LLP

By: /s/ Craig J. Mariam
CRAIG J. MARIAM
Attorneys for Defendant
POWERHOUSE RETAIL SERVICES, LLC

Dated: March 28, 2025

SWIGART LAW GROUP, APC

By: /s/ Joshua B. Swigart
JOSHUA B. SWIGART
Attorneys for Plaintiff
DAVID RAMIREZ